

both S&B's computer network system and their phone system. We are advised that flash flood warnings are in effect and the problems may continue through tomorrow.

3. Plaintiffs, therefore, submit that good cause exists for the granting of the requested extension.

4. The requested extension does not affect any other scheduled dates in this action, including the hearing on Plaintiffs' motion for class certification, which is set for July 10, 2006.

WHEREFORE, the Plaintiffs respectfully request that they be granted an extension to file their reply in support of their motion for class certification through June 28, 2006.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

Undersigned counsel certifies that they have conferred with counsel for Defendants in a good faith effort to resolve or narrow the issues raised by this Motion and that Defendants' counsel indicated that they would assent to this Motion.

Dated: June 26, 2006

Respectfully submitted,

/s/ Douglas M. Brooks

David Pastor (BBO #391000)

Douglas M. Brooks (BBO #058850)

GILMAN AND PASTOR, LLP

60 State Street, 37th Floor

Boston, MA 02109

Telephone: (617) 742-9700

Facsimile: (617) 742-9701

Plaintiffs' Liaison Counsel

Marc I. Willner
Karen E. Reilly
SCHIFFRIN & BARROWAY, LLP
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056

Plaintiffs' Lead Counsel

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 26, 2006.